IN THE DRAWINGS:

Changes to the specification were made to address the Examiner's objections to the drawings. Furthermore, the attached sheets of drawings include changes to Fig. 3A and Fig. 8A, also to address the Examiner's objections to the drawings.

Attachment: Replacement Sheets for Fig. 3A and Fig. 8A.
Annotated Sheets Showing Changes to Fig. 3A and Fig. 8A.

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REMARKS

This is intended as a full and complete response to the Office Action dated December 16, 2005, having a shortened statutory period for response set to expire on March 16, 2006. Please reconsider the claims pending in the application for reasons discussed below.

In the specification, paragraph [0027] has been deleted. Paragraphs [0048], [0049], [0106], [0114] and [0115] have been amended to correct minor editorial problems.

Claims 1-28 are pending in the application. Claims 1-4, 12-24 and 26-28 remain pending following entry of this response. Claims 1 and 21 have been amended. Claims 5-11 and 25 have been canceled.

Claim Rejections – Double Patenting

Claims 12, 18, and 21 are provisionally rejected under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 15, 25, and 28 of Co- pending Application No. 10/600021. Furthermore, claim 21 is provisionally rejected under the judicially created doctrine of obviousness- type double patenting as being unpatentable over claim 25 of Co-pending Application No. 10/600390.

The doctrine of obviousness-type double patenting is as cited by the examiner "[a] later patent claim is not patentably distinct from an earlier patent claim if the later claim is obvious over, or anticipated by, the earlier claim. (In re Longi, 759 F.2d at 896, 225 USPQ at 651). All of the applications cited by the examiner and the current application were filed on June 20, 2003. Therefore, the claims in the current application are not "later patent claims." Thus, Applicants respectfully request the obviousness-type double patenting rejection be withdrawn.

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Claim Rejections - 35 U.S.C. § 102

Claims 7-11 are rejected under 35 U.S.C. 102(e) as being anticipated by Altman (US Pub 2004/0163042). Claims 7-11 have been canceled, thereby obviating the rejection.

Claims 12-24 are rejected under 35 U.S.C. 102(e) as being anticipated by *Gupta* et al. (US Patent 6,956,593, hereinafter referred as *Gupta*). Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

In this case, *Gupta* does not disclose "each and every element as set forth in the claim." For example, with respect to claim 12 and claim 18 *Gupta* does not disclose "selecting, based, at least in part, on the set of identifying parameters, an annotation structure defining one or more annotation fields." The Examiner argues that *Gupta* discloses "selecting, based, at least in part, on the set of identifying parameters, an annotation structure defining one or more annotation fields" at column 13, Lines 25-28. The cited passage reads as follows:

> Dialog box **280** further includes an annotation type selector in the form of radio buttons **290**, **292**, and **294**, selection of which creates text annotation, an audio annotation, or a uniform resource locator (URL) annotation, respectively. (*Gupta*, Col. 13, Lines 25-28).

The cited passage is directed to what type of information, be that information text, audio, or a URL, is used to create the data contained within an annotation. While different data may be selected in *Gupta* to be included in an annotation, in *Gupta* it is the annotation data that is selected by the user. However, there is no teaching of the selection, by an application, of "an annotation structure defining one or more annotation

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fields" as recited in the claims. Further, in the present claims, the annotation structure is selected based on a set of identifying parameters that indicate an annotation structure defining what annotation fields are to be presented to the user.

Nowhere in the cited passage, or anywhere else within *Gupta* is "selecting, based, at least in part, on the set of identifying parameters, an annotation structure defining one or more annotation fields." Therefore, applicants submit that claims 12 and 18 and their dependents are allowable, and allowance of the claims is respectfully requested.

Claim Rejections - 35 U.S.C. § 103

Claims 1 and 21 are rejected under 35 U.S.C. 103(a) as being unpatentable over *Gupta* as applied to claim 1 and 21 above, and further in view of Naser Barghouti and Stephen North ("Improvise - a process modeling interface with multimedia graph diagrams" in Electronic Proceedings of the ACM Workshop on Effective Abstractions in Multimedia: Layout, Presentation, and Interaction In association with ACM Multimedia '95, hereinafter referred as *North*).

The Examiner bears the initial burden of establishing a *prima facie* case of obviousness. *See* MPEP § 2142. To establish a *prima facie* case of obviousness three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one ordinary skill in the art, to modify the reference or to combine the reference teachings. Second, there must be a reasonable expectation of success. Third, the prior art reference (or references when combined) must teach or suggest all the claim limitations. *See* MPEP § 2143. The present rejection fails to establish at least the third criteria.

With respect to the third criteria, the Examiner takes the position (with respect to original claims 5 and 25) that *North* discloses the claim 1 limitation of "wherein the plurality of annotatable data objects comprise at least one of electrical schematics and mechanical schematics" and the claim 21 limitation of "wherein the one or more different type data sources comprise at least one of electrical schematics and mechanical schematics." Respectfully, Applicants submit the limitation is not disclosed in *North*.

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North is directed to a product called "Improvise", which is a "process modeling and analysis system" which "automates the creation and modification of process flow models." (*North* paragraph 4 and 5). "Improvise" is a "graphical model that represents a process flow as a multi-layered directed graph with various node types." (*North* paragraph 5). *North* envisions different data objects being associated with these nodes such as text, images, audio, video, and executable objects. (*North* paragraph 5).

Nowhere in *North* is it explicitly stated or implied that the "Improvise" graphical model associates electrical or mechanical schematics with the nodes or anything else as recited in the claims. Moreover, *North* fails to even mention electrical or mechanical schematics. Thus, *Gupta* in view of *North* fails to teach or suggest the claim 1 limitation of "wherein the plurality of annotatable data objects comprise at least one of electrical schematics and mechanical schematics" and the claim 21 limitation of "wherein the one or more different type data sources comprise at least one of electrical schematics and mechanical schematics." Therefore, applicants submit that claims 1 and 21 and their dependents are believed to be allowable, and allowance of the claims is respectfully requested.

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Conclusion

The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicant's disclosure than the primary references cited in the office action. Therefore, Applicant believes that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully requests that the claims be allowed.

Respectfully submitted,

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ROC920030209US1

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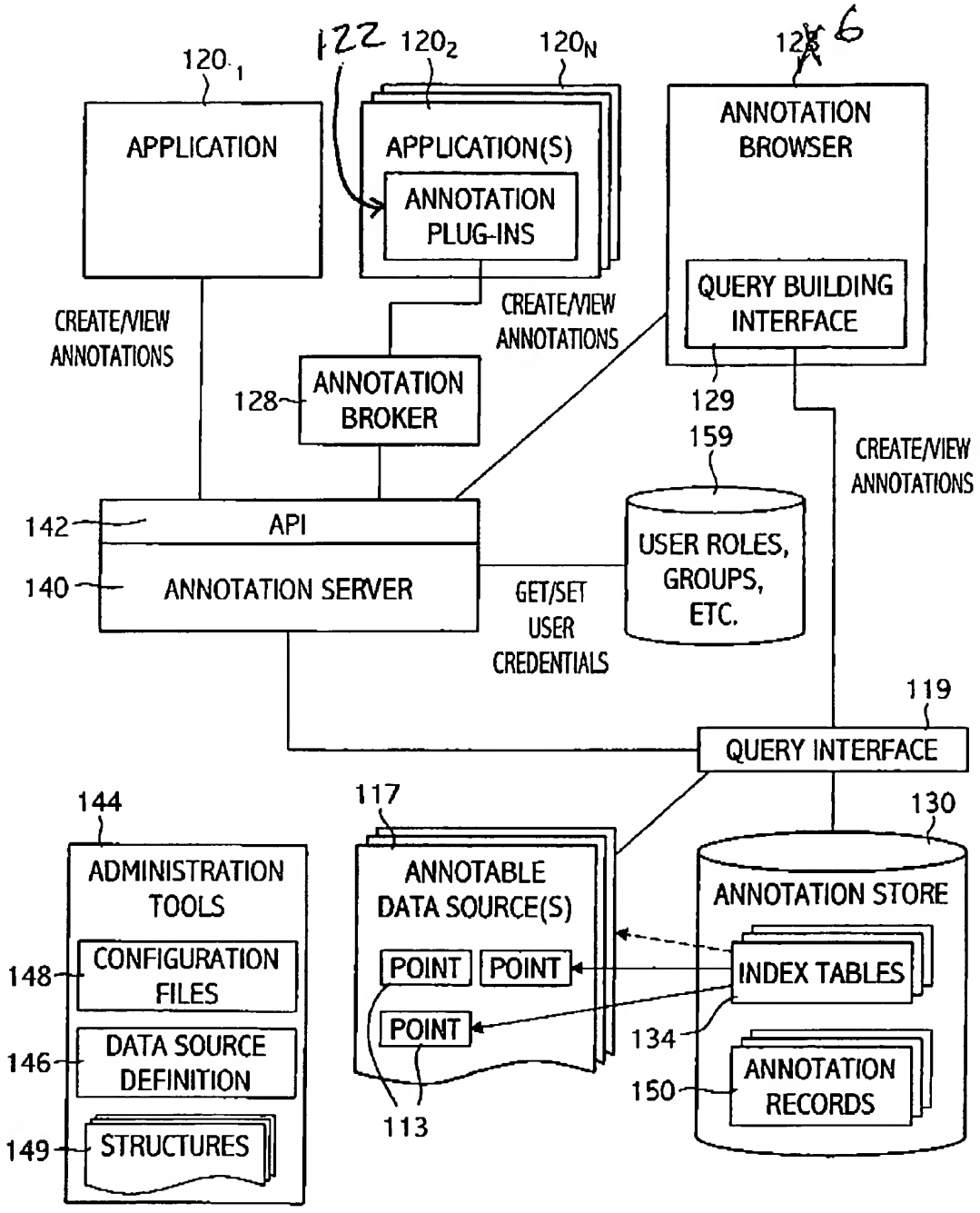

FIG. 3A

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Annotated Sheet Showing Changes

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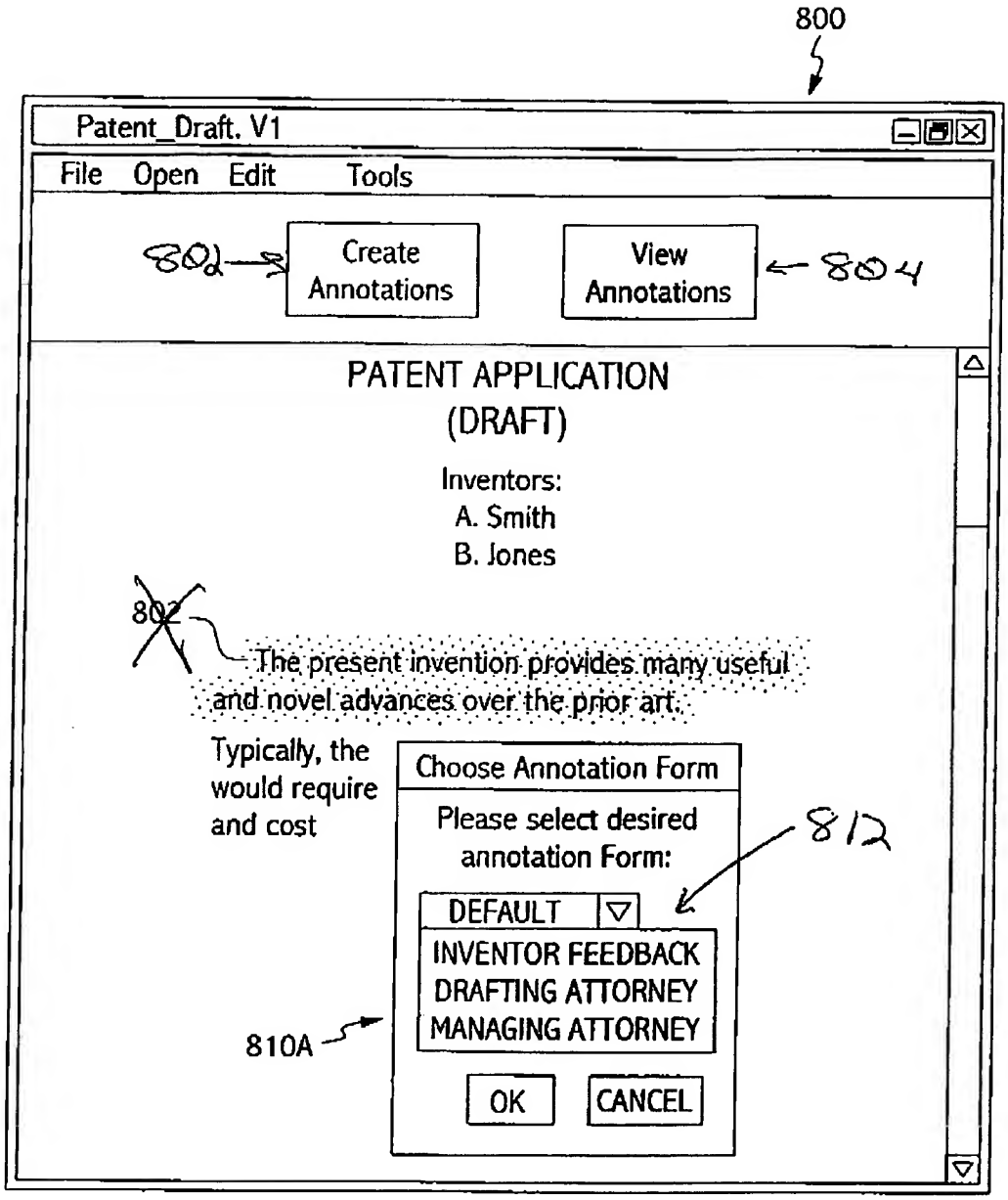

FIG. 8A